

EXHIBIT F

From: Markel, Tatiana [<mailto:tmarkel@bakerlaw.com>]
Sent: Saturday, February 18, 2017 1:30 PM
To: Helen Chaitman <hchaitman@chaitmanllp.com>; Jennifer Allim <jallim@chaitmanllp.com>
Cc: Kates, Elyssa S. <ekates@bakerlaw.com>; Gentile, Dominic A. <dgentile@bakerlaw.com>
Subject: RE: Adv. Pro. No. 10- 04469: Picard v. Kamenstein, Carol

Helen:

Our time to depose the Kamenstein defendants is not restricted by any orders. If you are referring to Judge Maas's order in a different case, that order does not apply here. If you seek to have Judge Maas's discovery orders apply in this adversary proceedings, please provide a stipulation signed by the defendants stating that they agree to be bound.

But note that, even if you were to provide such a stipulation, the times you proposed below still do not work. The parties, counsel, and especially the stenographer and videographer, must be allowed to take lunch, and breaks as necessary. One deposition at 10 am and then next one at 2 pm does not allow for that.

Please let us know at your earliest convenience if you will be providing a stipulation, and if so, provide alternative start times for each of the depositions. If you do not provide a stipulation, and to the extent the defendants do not make themselves available for the full amount of time allowed by the Federal Rules, we may seek to recall them.

Best regards,
Tatiana

Tatiana Markel
Associate

BakerHostetler

45 Rockefeller Plaza
New York, NY 10111-0100
T 212.589.4615

tmarkel@bakerlaw.com
bakerlaw.com



From: Helen Chaitman [<mailto:hchaitman@chaitmanllp.com>]
Sent: Friday, February 17, 2017 6:55 PM
To: Markel, Tatiana; Jennifer Allim
Cc: Kates, Elyssa S.; Gentile, Dominic A.
Subject: RE: Adv. Pro. No. 10- 04469: Picard v. Kamenstein, Carol

By court order, each deposition cannot exceed four hours. Thus, there is no problem doing two/day. We are definitely not making the witnesses available for another day.

Helen Davis Chaitman
Chaitman LLP
465 Park Avenue
New York, New York 10022
hchaitman@chaitmanllp.com
Cell: (908) 303-4568
Fax: (888) 759-1114

From: Markel, Tatiana [<mailto:tmarkel@bakerlaw.com>]
Sent: Friday, February 17, 2017 6:37 PM
To: Jennifer Allim <jallim@chaitmanllp.com>
Cc: Kates, Elyssa S. <ekates@bakerlaw.com>; Gentile, Dominic A. <dgentile@bakerlaw.com>; Helen Chaitman <hchaitman@chaitmanllp.com>
Subject: RE: Adv. Pro. No. 10- 04469: Picard v. Kamenstein, Carol

Jennifer:

You advised me yesterday, for the first time, that Sloan and Tracy are going to be available on these dates. All correspondence before yesterday concerned the depositions of only David and Carol on the 22nd and 23rd. Despite the short notice and truncated schedule, we agreed to proceed with four depositions over two days, *provided* we start at 9 am. You agreed.

While starting at 10 a.m. would be fine had we scheduled 1 deposition for each day, now that we have two, it means that the depositions will run well into the evening.

Also, while starting with David at 2pm will not shorten our time to depose him, he will have to be available until 7 or 7:30 pm, at least. I will do my best to finish earlier but, as I mentioned before, we need more time with David as he appears to be the person who managed the BLMIS accounts and thus is likely to have the most knowledge.

Furthermore, on Thursday evening we fly back to New York and must end by 5pm. I would therefore ask that Tracy be available at 1:30 pm.

The only alternative I can offer is that we will agree to 10:00 and 2:00 on both days, provided these witnesses be made available again at a later date if we do not finish. Please let me know how you would like to proceed.

If we are unable to resolve this issue, we should try to schedule a call with Judge Maas on Monday morning.

Best regards,
Tatiana

From: Jennifer Allim [<mailto:jallim@chaitmanllp.com>]
Sent: Friday, February 17, 2017 4:29 PM
To: Markel, Tatiana
Cc: Kates, Elyssa S.; Gentile, Dominic A.; Helen Chaitman
Subject: RE: Adv. Pro. No. 10- 04469: Picard v. Kamenstein, Carol

Tatiana:

These are the times that the Defendants are available. Starting with Carol at 10:00 am will not shorten your time to depose David, starting at 2:00 p.m. on the 22nd. Likewise, the amount of time you have will not be impacted by starting with Sloan at 10:00 am and then proceeding with Tracy at 2:00 p.m. on the 23rd.

Best,

Jen

Jennifer Allim
Chaitman LLP
465 Park Avenue
New York, New York 10022
jallim@chaitmanllp.com
Office: (888) 759-1114 ext. 7
Fax: (888) 759-1114

From: Markel, Tatiana [<mailto:tmarkel@bakerlaw.com>]
Sent: Friday, February 17, 2017 4:01 PM
To: Jennifer Allim <jallim@chaitmanllp.com>
Cc: Kates, Elyssa S. <ekates@bakerlaw.com>; Gentile, Dominic A. <dgentile@bakerlaw.com>; Helen Chaitman <hchaitman@chaitmanllp.com>
Subject: RE: Adv. Pro. No. 10- 04469: Picard v. Kamenstein, Carol

Jennifer:

We agreed to start at 9 a.m., not 10 a.m., and I explained that I will need more time with David Kamenstein.

So while I am fine with the order, the time doesn't work.

We can start with Carol at 9 a.m, and David at approximately 1:30pm.

On Thursday, we can start at 9:30, if that is easier.

From: Jennifer Allim [<mailto:jallim@chaitmanllp.com>]
Sent: Friday, February 17, 2017 3:11 PM
To: Markel, Tatiana
Cc: Kates, Elyssa S.; Gentile, Dominic A.; Helen Chaitman
Subject: RE: Adv. Pro. No. 10- 04469: Picard v. Kamenstein, Carol

Tatiana:

Apologies, but there has been a correction to the order in which the Defendants will be produced.
Ms. Chaitman has outlined that the Defendants have been coordinated to be produced as follows:

Wednesday, February 22:

10:00 a.m. Carol Kamenstein
2:00 p.m. David Kamenstein

Thursday, February 23:

10:00 a.m. Sloan Kamenstein
2:00 p.m. Tracy Kamenstein

Please amend the Notices accordingly.

Thanks very much.

Best,

Jennifer

Jennifer Allim
Chaitman LLP
465 Park Avenue
New York, New York 10022
jallim@chaitmanllp.com
Office: (888) 759-1114 ext. 7
Fax: (888) 759-1114

From: Markel, Tatiana [<mailto:tmarkel@bakerlaw.com>]
Sent: Friday, February 17, 2017 2:35 PM
To: Jennifer Allim <jallim@chaitmanllp.com>
Cc: Kates, Elyssa S. <ekates@bakerlaw.com>; Gentile, Dominic A. <dgentile@bakerlaw.com>; Helen Chaitman <hchaitman@chaitmanllp.com>
Subject: RE: Adv. Pro. No. 10- 04469: Picard v. Kamenstein, Carol

Jennifer:

Please find attached the amended notices. Let's start with Tracy on Thursday.

Thanks,
Tatiana

From: Jennifer Allim [<mailto:jallim@chaitmanllp.com>]
Sent: Friday, February 17, 2017 1:45 PM
To: Markel, Tatiana
Cc: Kates, Elyssa S.; Gentile, Dominic A.
Subject: RE: Adv. Pro. No. 10- 04469: Picard v. Kamenstein, Carol

With whom would you like to begin on the 23rd so I can give the clients notice? Will you be issuing new Notices? If so, I will forward them the Notices once received.

Jennifer Allim
Chaitman LLP
465 Park Avenue
New York, New York 10022
jallim@chaitmanllp.com
Office: (888) 759-1114 ext. 7
Fax: (888) 759-1114

From: Markel, Tatiana [<mailto:tmarkel@bakerlaw.com>]
Sent: Friday, February 17, 2017 1:32 PM
To: Jennifer Allim <jallim@chaitmanllp.com>
Cc: Kates, Elyssa S. <ekates@bakerlaw.com>; Gentile, Dominic A. <dgentile@bakerlaw.com>
Subject: RE: Adv. Pro. No. 10- 04469: Picard v. Kamenstein, Carol

Jennifer:

It appears that David managed most of these accounts, and his deposition will likely take longer. It is hard to say, but I doubt that Carol's will start before 2-2:30pm.

From: Jennifer Allim [<mailto:jallim@chaitmanllp.com>]
Sent: Friday, February 17, 2017 1:27 PM
To: Markel, Tatiana
Cc: Kates, Elyssa S.; Gentile, Dominic A.
Subject: RE: Adv. Pro. No. 10- 04469: Picard v. Kamenstein, Carol

Hi Tatiana,

9 am on the 22nd will work, beginning with David Kamenstein. Helen will be appearing in person. What time do you anticipate Carol's deposition will begin? We can follow the same schedule on the 23rd for Sloan and Tracy. Please let me know with whom you would like to begin on the 23rd.

Best,

Jennifer

Jennifer Allim
Chaitman LLP
465 Park Avenue
New York, New York 10022

jallim@chaitmanllp.com

Office: (888) 759-1114 ext. 7

Fax: (888) 759-1114

From: Markel, Tatiana [<mailto:tmarkel@bakerlaw.com>]

Sent: Friday, February 17, 2017 1:21 PM

To: Jennifer Allim <jallim@chaitmanllp.com>

Cc: Kates, Elyssa S. <ekates@bakerlaw.com>; Gentile, Dominic A. <dgentile@bakerlaw.com>

Subject: RE: Adv. Pro. No. 10- 04469: Picard v. Kamenstein, Carol

Jennifer:

Let's start at 9am.

Will Helen be there in person?

Thanks,
Tatiana

From: Jennifer Allim [<mailto:jallim@chaitmanllp.com>]

Sent: Thursday, February 16, 2017 9:55 AM

To: Markel, Tatiana

Cc: Kates, Elyssa S.

Subject: RE: Adv. Pro. No. 10- 04469: Picard v. Kamenstein, Carol

Good morning Tatiana:

We are confirmed for David and Carol on the 22nd and Sloan and Tracy on the 23rd.

Times were not discussed, but an earlier start time would be fine. How is 9:00 a.m.?

Jennifer Allim
Chaitman LLP
465 Park Avenue
New York, New York 10022
jallim@chaitmanllp.com
Office: (888) 759-1114 ext. 7
Fax: (888) 759-1114

From: Markel, Tatiana [<mailto:tmarkel@bakerlaw.com>]

Sent: Wednesday, February 15, 2017 7:34 PM

To: Jennifer Allim <jallim@chaitmanllp.com>

Cc: Kates, Elyssa S. <ekates@bakerlaw.com>

Subject: RE: Adv. Pro. No. 10- 04469: Picard v. Kamenstein, Carol

Jennifer:

The deposition is taking place at U.S. Legal Support, 444 West Railroad Avenue, Suite 300, West Palm Beach, FL 33401.

I don't know whether we discussed a start time, but given the additional two witnesses, we may want to start a bit earlier. Please let me know if we are confirmed for Sloan and Tracy on the 22nd and Carol and David on the 23rd.

Thank you!

From: Jennifer Allim [<mailto:jallim@chaitmanllp.com>]
Sent: Wednesday, February 15, 2017 5:26 PM
To: Markel, Tatiana
Cc: Kates, Elyssa S.
Subject: FW: Adv. Pro. No. 10- 04469: Picard v. Kamenstein, Carol

Hi Tatiana:

As per our conversation, I have confirmed that David and Carol are available on the 22nd and Sloan and Tracy are available on the 23rd.

Please let me know with whom you would like to begin on the 23rd and the location once secured.

Best,

Jennifer

Jennifer Allim
Chaitman LLP
465 Park Avenue
New York, New York 10022
jallim@chaitmanllp.com
Office: (888) 759-1114 ext. 7
Fax: (888) 759-1114

From: Jennifer Allim
Sent: Wednesday, February 15, 2017 4:26 PM
To: 'Markel, Tatiana' <tmarkel@bakerlaw.com>; Kates, Elyssa S. <ekates@bakerlaw.com>
Subject: RE: Adv. Pro. No. 10- 04469: Picard v. Kamenstein, Carol

Hi Tatiana:

To the extent that you are deposing all defendants in this matter let's begin with David and Carol on the 22nd and proceed with Sloan and Tracy on the 23rd. Have you secured a location?

Jennifer Allim
Chaitman LLP
465 Park Avenue
New York, New York 10022
jallim@chaitmanllp.com
Office: (888) 759-1114 ext. 7
Fax: (888) 759-1114

From: Markel, Tatiana [<mailto:tmarkel@bakerlaw.com>]
Sent: Wednesday, February 15, 2017 3:05 PM
To: Jennifer Allim <jallim@chaitmanllp.com>; Kates, Elyssa S. <ekates@bakerlaw.com>
Subject: RE: Adv. Pro. No. 10- 04469: Picard v. Kamenstein, Carol

Jennifer:

I assume both Carol and David Kamenstein are available both days?

If so, I would like to start with David Kamenstein on the 22nd.

Thanks,
Tatiana

From: Jennifer Allim [<mailto:jallim@chaitmanllp.com>]
Sent: Wednesday, February 15, 2017 12:40 PM
To: Kates, Elyssa S.
Cc: Markel, Tatiana
Subject: RE: Adv. Pro. No. 10- 04469: Picard v. Kamenstein, Carol

Hi Elyssa:

Please send Exhibits pertaining to these depositions to:

Helen D. Chaitman
c/o Renny Reynolds
65 Curlew Road
Manalapan, Florida 33462

Thanks very much.

Best,

Jen

Jennifer Allim
Chaitman LLP
465 Park Avenue
New York, New York 10022
jallim@chaitmanllp.com
Office: (888) 759-1114 ext. 7
Fax: (888) 759-1114

From: Kates, Elyssa S. [<mailto:ekates@bakerlaw.com>]
Sent: Monday, February 06, 2017 5:52 PM
To: Jennifer Allim <jallim@chaitmanllp.com>
Cc: Markel, Tatiana <tmarkel@bakerlaw.com>
Subject: RE: Adv. Pro. No. 10- 04469: Picard v. Kamenstein, Carol

Jen,

We are confirmed.

Regards,

Elyssa

From: Jennifer Allim [<mailto:jallim@chaitmanllp.com>]
Sent: Friday, February 03, 2017 4:13 PM

To: Kates, Elyssa S.

Subject: Adv. Pro. No. 10- 04469: Picard v. Kamenstein, Carol

Hi Elyssa:

I am confirming the depositions of David and Carol Kamenstein on February 22 and 23 in West Palm Beach, Florida.

Best,

Jen

Jennifer Allim
Chaitman LLP
465 Park Avenue
New York, New York 10022
jallim@chaitmanllp.com
Office: (888) 759-1114 ext. 7
Fax: (888) 759-1114

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